

# ***RELIGIOUS VOICES IN BROADCASTING***

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April 28, 2008

The Honorable Kevin Martin  
Chairman  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W., 8<sup>th</sup> Floor  
Washington, D.C. 20554

## **RE: MB Docket No. 04-233 Report on Broadcast Localism and Notice of Proposed Rulemaking**

Dear Chairman Martin:

On behalf of Religious Voices in Broadcasting, the following overview provides information on the valuable local programming small, independent and religious broadcast stations provide to communities across the nation, as well as reasons for our concerns and opposition to mandatory community advisory boards.

### **Introduction**

Religious Voices in Broadcasting (“RVB”) is a group of full-power religious broadcasters and networks who focus on spiritual, family-friendly, and community-oriented programming. RVB is comprised of the nation’s largest religious broadcast networks and many small and independent religious broadcasters across the country (see attached list of members). RVB works with hundreds of television stations and affiliates around the country to provide positive and values-based programming to millions of American households by developing original programming that offers an alternative to the commercially-driven, and often violent, profane, and indecent programming that have inundated the major networks and cable-only channels. Even in cases where programming is imported, it remains locally relevant and important to each station’s viewers.

In the past, broadcasters were required to adhere to detailed, formal procedures to determine the needs and interests of their communities during a station’s initial authorization and for license renewals. This “ascertainment” requirement was ultimately eliminated in the 1980’s, as the Commission believed the potential benefits did not justify the costs. We understand the FCC is reconsidering this issue, and while it does not seek to fully revive the ascertainment process, the FCC seeks to establish advisory boards that are representative of all segments of the community. In addition, the Commission recommends quarterly licensee meetings with such boards. RVB strongly opposes this proposed rule as it will create another

unfunded mandate by the FCC and further financially burden small, independent and religious broadcasters.

I. Preserving our right to continue faith-based programming may be hindered by the creation of community advisory boards.

RVB believes that promoting the widespread dissemination of information from a multiplicity of sources preserves a basic tenant of American communications policy. Likewise, encouraging a diversity of viewpoints and choices in the television medium is an important government interest. Today's multimedia environment offers a number of forums for citizens and politicians alike to express their viewpoints and participate in a public dialogue.

RVB recognizes that faith-based programming may not appeal to the entire viewing audience. We respect our audience's right to choose for themselves the types or programming they view. The FCC's proposed community advisory boards are intended to represent all segments of the community, some of which are unlikely to share the same editorial viewpoints of RVB members. We believe this could ultimately have a negative impact on the content of our programming. Community advisory boards may hinder religious broadcasters' Constitutional right of free speech by discouraging the coverage of differing viewpoints. This would in fact limit the autonomy and very freedom of broadcasters.

II. Community advisory boards will cause undue hardships on small, independent and religious broadcasters.

While RVB strongly believes that encouraging a diversity of viewpoints and choices in the television medium is an important government interest, unfunded mandates, like the Commission's proposed community advisory board, will cause undue hardships on small, independent and religious broadcasters. Our stations are already struggling with the burden of developing digital programming plans in an uncertain regulatory environment, while simultaneously financing the costs of digital build-out without an assurance of multicast must-carry/anti-stripping. Gratuitous regulations such as the community advisory boards requirement add to our burden. Broadcasters like RVB would find no benefit to implement this additional regulation which is logistically and financially infeasible for our stations.

Regardless of our extensive record of public service, community support and our strong record of airing "compelling" programming, we continue to be impeded by initiatives which will in fact limit the autonomy and very freedom of broadcasters, while less burdensome efforts such as multicast must-carry/anti-stripping are ignored that will promote public interests.

**III. Community advisory boards are unnecessary.**

Community advisory boards are unnecessary and redundant as broadcasters, like members of RVB, already rely on our viewers to provide us with valuable feedback. The principals and employees of our stations are active in our communities, with our local churches schools, non-profits and other organizations. This feedback provides us with a direct understanding of the needs and views of our local constituencies. If we were unsuccessful in meeting the community's needs, then our advertisers and donors will not support our stations. The very existence of our stations affirms the fact that we meet the community's interests.

Our stations not only air faith-based and evangelical programming, but also provide diverse programming in the forms of high school, minor league and local sports; political; Spanish language; and local community interest shows. RVB works with hundreds of television stations and affiliates around the country to provide positive and values-based programming to millions of American households to serve as an alternative to the commercially-driven and often violent, profane, and indecent programming that inundates the major networks and cable-only channels.

**IV. RVB stations are already committed to airing locally relevant, quality, family-friendly and faith-based programming which serves an important public interest, and we are strongly committed to doing so in the future.**

The following overview provides information on the valuable programming small, independent and religious broadcast stations provide to communities across the nation and programming they plan on offering:

**Mr. Mike Reed, President of KMCT-TV 39 in the West Monroe, Louisiana area,** airs 50 hours of local programming each week. KMCT's current programming includes *Fully Alive*, a live, one-hour nightly talk show hosted by Mr. Reed, which brings diverse people from the community together to discuss issues of the day. Guests include Members of Congress, Louisiana Governors and local Mayors who speak on topics such as health, marriage and other local concerns. During the show KMCT has a phone bank available for viewers to call in with questions, concerns or comments. *Explore the Bible*, hosted by retired pastor Dr. John Taylor, is a Southern Baptist Association program that includes writings and teachings from Dr. Taylor, and provides a spiritual outlet for those who cannot leave their homes because of injury or illness. *Teen's Focus* is a show dedicated to exploring and addressing issues present in the daily lives of today's youth, from school to family to peer pressure and more. Mr. Tim Johnson is a local pastor who invites area teens on the show to discuss issue management and crisis prevention. *Let God Be True* is a locally produced show that airs the preaching of area churches and highlights the teachings of Pastor Larry Burrell, who uses graphs and visual aids to educate viewers. *Sacred Conversations* is a locally produced show hosted by Mr. Robert

Charles Payne, a West Monroe businessman, and previous football coach for West Monroe High School. Mr. Payne invites guests to speak about issues facing the community, including sports, health and disciplines of life.

KMCT's programming schedule is replete with locally produced shows that provide valuable services to Louisiana communities. Neville High School, Ouachita High School and Louisiana Tech University each airs an hour per week of game highlights and interviews with coaches and players on KMCT. Ouachita High School also interviews students to discuss activities on campus including clubs, organizations and other school sponsored programs. Louisiana Tech University airs the basketball games of their well-ranked women's team. KMCT supports the development of broadcasting and production experience for students at the University of Louisiana at Monroe and Grambling University, which has a predominantly African-American student body, by hiring them to work at the station and cover issues relating to their university, including local sports.

**Mr. Richard Hawkins** is the General Manager of **WLLA-TV 64**, the only independent station in the **Kalamazoo-Grand Rapids-Battle Creek** market. WLLA offers a variety of family-friendly programming, boasting the most hours of local programs in the market--17 hours per week. Among the shows WLLA airs is, *Transformed*, a daily show hosted by Pastor Joel A. Brooks, Jr. that focuses on the African-American constituency through programming that promotes racial harmony. Mr. Brooks leads an interdenominational and multiracial congregation of 2000 people. *Getting a Grip* is a unique show, hosted by one of the few female Pastors in Kalamazoo. Mrs. Beth Jones' teachings extend to the community at large and reflect a female perspective on the Christian doctrine. Pastor Duane VanderKlok hosts *Walking by Faith*, a daily teaching and bible study program that breaks from tradition by taking viewers on adventures that relate to bible stories, including hunting expeditions. Pastor Addis Moore hosts *Mt. Zion Baptist Church*, another program that targets the African-American population and focuses on the needs of that community. A popular show among the community is programming from the Catholic Diocese of Kalamazoo, which produces holiday specials and recaps of their yearly missions abroad.

In addition to valuable local church programming, WLLA works with Western Michigan University ("WMU") to air local coach's shows, as well as men and women's basketball games. In association with the Michigan High School Athletics Association, WLLA is committed to annually airing the girl's high school volleyball championships from the WMU campus, which provides a unique opportunity for these young girls to gain public exposure.

**Dr. James Thompson** has developed a loyal and devoted following in **South Carolina** due to his remarkable thirty-year record of broadcast public service to **Greenville** and its surrounding areas with his station, **WGGS-TV 16**. He has similar stature in

**Atlanta, Georgia**, where he owns a second television station, **WATC-TV 57**. Most notably, Dr. Thompson and his wife Joanne host *The Nightline*, a live two-hour weeknight call-in program on WGGs, which gives people from the community an opportunity to discuss a variety of local interests. Discussion topics have included conversations on current weather conditions and crop conditions; oral histories of South Carolina; highlights of area elderly and indigent care services as well as conversations on how issues of national significance affect South Carolinians. The Atlanta station, WATC, devotes the same amount of time and resources to their live, local nightly show. WGGs' daily variety program, *The Peggy Denny Show*, offers cooking and household tips and reviews of local arts and politics. *Nancy's Heartbeat*, hosted by Nancy Corso, Greenville's local chiropractor with a Master's Degree in Trauma, is a weekly show on fitness and the latest news in medicine. *Jewish Jewels* is a show that focuses on the Jewish religion and those who practice the faith in the area.

Since the beginning of the Iraqi War, Dr. Thompson's stations often air a daily scroll of the names of the local soldiers who are committed to active duty in Iraq and ask viewers to send prayers and well wishes to the troops. WGGs keeps a phone bank of volunteer "listeners" who comfort lonely or in need viewers in the area and refers more troubled individuals to local crisis help groups. WATC also is the home to a unique program, *The Gravedigger Show*, hosted by Joe Oreskovich, a former homeless man who was rescued by the local fire department. Joe interviews firemen, policemen, doctors, politicians and others to inspire and provide resources, guidance and hope to those in most need and at-risk, including alcoholics, the unemployed, and the indigent.

**Ms. Grace Rendall** and **KSCE-TV 38 in El Paso, Texas** play a unique role in their diverse community by providing bilingual and local programming to the ethnic and religious groups in the region. KSCE airs daily programming in English and Spanish and provides valuable media resources for El Paso's large Hispanic community, which has limited family-friendly programming choices. Additionally, KSCE airs a variety of programs that cater to the sizable El Paso Jewish community, like the bi-weekly showing of the *Jewish Voice* and Jewish high holy days seasonal shows.

Station **KCHF-TV 11 in Santa Fe, New Mexico**, is dedicated to providing the communities throughout New Mexico with positive, informational, and entertaining quality Christian programming that meets the needs of the diverse community. As the only station broadcasting from the state capital, KCHF plays an active role in the Santa Fe area through *Issues & Answers*, a weekly program hosted by the former Press Secretary who invites representatives of state government agencies to discuss valuable state programs available to New Mexicans and invites qualified guests to address concerns affecting the community. KCHF is a leader in health and nutrition programming and produces *A Healthier You*, a program offering the

most current information on prevention and awareness of diseases significantly affecting the health of every New Mexican, young and old. KCHF works closely with local churches and charitable causes in an effort to help those who have been victimized through many circumstances. Including but not limited to work that has been done in conjunction with the United Jewish Communities to help Israeli victims of terror.

**Mr. Jamey Schmitz** of **WLMB-TV 40 Toledo, Ohio** airs *Pastor's Point* and *Find a Local Church*, programs that feature up to ninety-eight different local religious venues a year. To date, over thirty denominations have been represented on these half hour weekly programs. Currently, the station has a backlog of over one hundred community leaders and venues awaiting the opportunity to feature their services. In many cases, these shows are the only television exposure that churches, synagogues and cultural specific religious organizations including African American and Hispanic parishioners are afforded. These shows have been extremely successful in helping new Toledo area residents and those new to faith find a place of worship for their families. In 2004, WLMB began airing the Toledo Mud Hens baseball games. The beloved Mud Hens are the farm team for the Detroit Tigers.

**Mr. Ken Mikesell's Orlando, Florida** station, **WTGL-TV 52**, regular programming features local nutritionists, physicians, counselors and other community leaders who discuss health, psychological and spiritual needs of the community. WTLG produces the Easter Sunrise service at Sea World in Florida for uplink to stations across the country, including the Armed Services Network, which it carries to all U.S. military bases. WTLG is extremely active with local social and civic organizations and uses its airwaves to promote interest and support for worthwhile projects. For instance, the station organizes food drives for local ministries; arranged for receipt of over 5000 turkeys to the Destiny Food Center in Orlando for Thanksgiving 2002; provided "Bags of Joy" to over 2000 families through Harvestime International in Sanford; works with Operation Christmas Child, run by Reverend Billy Graham's son Franklin, to supply toys, toiletries and clothing to the needy; and participates in many other rewarding ventures.

**Christian Television Network (CTN)**, headquartered in **Clearwater, Florida**, is dedicated to bringing positive Christian programming with family-friendly, wholesome messages to its viewers from all socio-economic backgrounds. Since its inception twenty years ago, CTN, its Tampa Bay station **WCLF**, and its founder **Mr. Bob D'Andrea** have developed unique local programs including, *Bay Focus*, an original show that features and highlights ministries in central Florida that are involved in charitable activities to feed the homeless, create support centers in inner cities, and provide assistance to the needy. CTN also devotes numerous hours of programming to youth and Latinos with original programs like *La Vida Ahora* (Today's Life), *Vida Dura* (A Hard Life), *Kids Like You*, and *Kids on the Move*. CTN

also owns full power stations including **WHBR-Pensacola**, **WHTN-Nashville**, **WVLR-Knoxville**, **WRXY-Ft. Myers**, **WFGC-Palm Beach** and **WGNM-Tampa**.

**Mr. Pete Sumrall**, President of **LeSEA Broadcasting**, owns and operates television stations in **Indianapolis, Indiana (WHMB-TV 40)**; **South Bend, Indiana (WHME-TV 46)**; **Tulsa, Oklahoma (KWHB-TV 47)**; **New Orleans, Louisiana (WHNO-TV 20)**; **Denver, Colorado (KWHD-TV 53)**; **Colorado Springs, Colorado (KWHs-TV 51)** and **Honolulu, Hawaii (KWHE-TV 14)**. All of these stations are uniquely focused on being involved with local programming such as High School athletics and local church programs.

In addition, LeSEA Broadcasting produces a daily live talk-show program, *The Harvest Show*, which deals with day-to-day living for Christian America. Other original programming developed and produced by LeSEA include *Live from Studio B*, a weekly Christian music show; the *Lester Sumrall Teaching* series, hosted by the late Dr. Lester Sumrall the program provides helpful insight into life's difficult questions scripturally; *Bible Prophecy Unraveled*, answers questions concerning the prophetic End-Times; *Making Healthy Choices*, provides answers to life's health questions; Israel specials, programs done live from Israel; and others.

**Mr. Richard Schilg** is general manager of **WSFJ Channels 51 in Newark-Columbus, Ohio** and President of **Guardian Television Network**, on the Sky Angel satellite system. WSFJ is licensed, owned and operated by Guardian Vision International, Inc., a non-profit non-denominational para church local ministry. In 1999, when Mr. Schilg became President and GM, he affiliated with the PAX television network (now ION) and he changed the format to a combination of edited family friendly programming and ministry programming, serving the community with a choice of less sex, violence and profanity in television. In 2003, WSFJ became rebroadcast as GTN (Guardian Television Network) on the national Sky Angel satellite system. Already producing many hours of programming a week, the national presence allowed for the development of more family friendly programs, such as *Every Young Man's Battle* a teen docudrama addressing internet pornography, *Bananas*, a family friendly stand-up comedy show with now 42 hours long episodes and *Taylor's Attic* a children's puppet sitcom featuring former Star Search winner and comedian Taylor Mason and many more programs. Locally, WSFJ features over 8 separate local ministries, produces and promotes many local concerts and promotes over 60 local events for various ministries and community support organizations a year.

**Drs. Garth and Tina Coonce**, co-founders of the **TCT Television Network ("TCT")**, operate full power TV stations in the **Grand Rapids, Michigan**; **Buffalo, New York**; **Greensboro, North Carolina**; and **Saginaw, Michigan**; designated market area's. TCT stations produce a wealth of local original programming specifically geared toward meeting the needs of families and local communities. For example, *Ask The Pastor* is TCT's most popular and long running locally produced television program.

*Ask The Pastor* is a call-in talk show featuring panels of pastors from a variety of cultural and denominational backgrounds who answer viewer questions from every imaginable theological and moral perspective. Response to the program is amazing and has grown to such a degree that TCT has recently added an evening edition called *The Answer* to address overflow call volumes and questions that require more in-depth discussion. TCT also produces an extraordinary variety of public interest and educational programs such as *A Different View* (women's issues); *Public Report* (community affairs); *Ultimate Living* (health and nutrition); *The Joys of Oneness* (marriage and family); *Spiritual Warfare* (with Rabbi Moshe Laurie); as well as inspirational musical programs such as *Down Home* (Inspirational Bluegrass); *Come On In* (Christian Country); *The Master's Music* (Southern Gospel); and *Road of Recovery* (Southern Gospel) and family-friendly original movies and documentaries such as *Believer's Among Us*; *Family Talk*; *The Heart of Christmas*; *Stone of Destiny*; *Great Witness*; and *Road to Armageddon*. TCT stations also air a number of trans-denominational/faith programs such as *Isaiah 58* and *On Wings of Eagles* (with Rabbi Yechiel Eckstein) and *Zola Levitt Presents* (with Dr. Zola Levitt).

Finally, **Total Living Network (TLN)** is a **Chicago**-based organization with a **San Francisco** affiliate, **KTLN-TV 68**. TLN's main objective is to produce and distribute original programming for the TLN schedule and the broader family-friendly broadcast marketplace. The unique programming TLN provides includes *Aspiring Women*, a show designed to address the concerns of modern women of all ages and backgrounds; and *Health Town*, an invigorating, healthy lifestyles show for the entire family. TLN also produces *Solid Rock VDO*, an inspirational and entertaining music video show. *All Around Rockford* is a show that highlights ministries in the community. **Mr. Jerry Rose**, President of TLN, hosts *TLN Now*, a public affairs program. TLN also works with several community-based non-profits, such as Kids Around the World, Pregnancy Care Center, Noah's Ark Animal Sanctuary, Rockford Rescue Mission and Motherhouse to provide public service announcements and broadcast exposure for their causes. TLN has found that their locally tailored programming brings members of the community together. Specifically, TLN focuses its outreach efforts on issues to help viewers cope with addiction, physical/mental abuse, health, grief, homelessness, gangs, divorce and sexual assault.

## Conclusion

The proposed community advisory boards would impose a burden on struggling religious, small and independent broadcasters. Therefore, we would encourage the FCC to promote the public interest obligations that are currently in place and focus on efforts such as multicast must-carry/anti-stripping which promote independent programming for local communities. Our mission as religious broadcasters is unique, and it is our hope that this important issue will receive the support and attention from our leaders that it deserves. RVB is proud of the programming we

offer and our true success is measured by the positive impact we have on our local communities and viewing audience. With the digital transition looming, we are excited about the possibilities of a digital television world and will continue to work to better serve our communities with programming chosen and developed for the specific needs of our local viewers.

On behalf of Religious Voices in Broadcasting, we encourage you to not impose further regulations that may include mandatory community advisory boards, as the viability of our station's futures depends on your decision. We thank you for your time and consideration of our position on this important matter.

Sincerely,



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Marcus Lamb  
President & CEO  
Daystar Television Network  
Texas



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Pete Sumrall  
President  
LeSEA Broadcasting  
Colorado, Hawaii and Indiana



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Garth Coonce  
President  
TCT Ministries, Inc.  
Network  
Illinois, North Carolina, New York,  
Tennessee  
Michigan, Ohio and Tennessee



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Robert D'Andrea  
President  
Christian Television  
Florida, Georgia, Iowa,  
and Illinois



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Jerry K. Rose



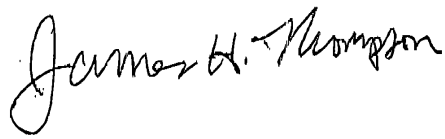
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Mike Smith

The Honorable Kevin Martin

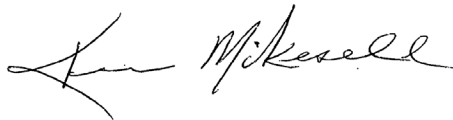
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President  
Total Living Network  
California, Illinois and Nevada



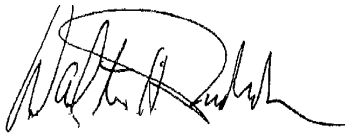
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Dr. James Thompson  
President  
Dove Broadcasting  
Georgia and South Carolina



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Ken Mikesell  
President  
Good Life Broadcasting  
Florida



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Walter Richardson  
President  
University Broadcasting  
Oklahoma



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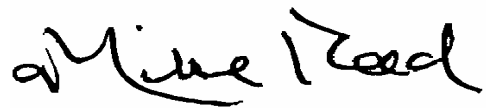
Grace Rendall  
General Manager  
KSCE, Texas

President & CEO  
Living Faith Television  
Virginia



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Richard Schilg  
General Manager  
WSFJ, Ohio



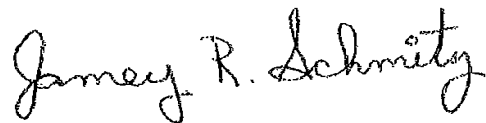
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Mike Reed  
President  
Lamb Broadcasting  
Louisiana



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Kevin Bowers  
President  
WTLW, Ohio



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Jamey Schmitz  
President & CEO  
WLMB, Ohio



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Rich Hawkins  
General Manager  
WLLA, Michigan

Cc: Commissioner Michael J. Copps  
Commissioner Jonathan S. Adelstein  
Commissioner Deborah Taylor Tate  
Commissioner Robert M. McDowell

### **Religious Voices in Broadcasting**

Jerry Rose, President, Total Living Network  
TLN Television Communications Center – Aurora, IL  
TLN-TV 51 – Rockford, IL  
KTLN-TV 68 – San Francisco, CA  
KEEN-TV 17 – Las Vegas, NV

Ken Mikesell, President, Good Life Broadcasting  
WTGL-TV 52 – Cocoa, FL  
WLCB-TV 45 – Leesburg, FL

Jamey Schmitz, President & CEO  
WLMB-TV 40 – Toledo, OH

Dr. James Thompson, President, Dove Broadcasting  
WGGS-TV 16 – Greenville, SC  
WATC-TV 57 – Atlanta, GA  
(plus 14 additional stations)

Grace Rendall, General Manager  
KSCE-TV 38 – El Paso, TX

Bob D'Andrea, President, Christian Television Network  
WCLF-TV 22 – Tampa, FL  
WHBR-TV 33 – Pensacola, FL  
WVUP-TV 45 – Tallahassee, FL  
WRXY-TV 49 – Fort Myers, FL  
WFGC-TV 61 – Palm Beach, FL  
WHTN-TV 39 – Nashville, TN  
WVLR-TV 48 – Knoxville, TN

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WGNM-TV 64 – Macon, GA  
WCGT-TV 16 – Columbus, GA  
KFXB-TV 40 – Dubuque, IA

Rich Hawkins, General Manager  
WLLA-TV 64 – Kalamazoo, MI  
WGGN-TV 52 – Sandusky, OH

Kevin Bowers, President  
WTLW-TV 44 – Lima, OH

Mike Reed, President, Lamb Broadcasting  
KMCT-TV 39 – West Monroe, LA

Richard Schilg, General Manager  
WSFJ-TV 51 – Columbus, OH

Garth Coonce, President, TCT Ministries, Inc.  
WTCT-TV 27 – Marion, IL  
WINM-TV 63 – Edgerton, OH  
WDYR-TV 33 – Dyersburg, TN  
WLXI-TV 61 – Greensboro, NC  
WNYB-TV 26 – Orchard Park, NY  
WAQP-TV 49 – Saginaw, MI  
WTLJ-TV 54 – Allendale, MI  
WDWO-TV 18 – Detroit, MI  
(plus 9 additional stations)

Mike Smith, President & CEO, Living Faith Television  
WLFG-TV 68 – Abingdon, VA  
WLFB-TV 40 – Blue Field, WV  
WAGV-TV 44 – Wallins Creek, KY

Pete Sumrall, President, LeSEA Broadcasting  
WHME-TV 46 – South Bend, IN  
KWHB-TV 47 – Tulsa, OK  
KWHE-TV 14 – Honolulu, HI  
KWHH-TV 14 – Hilo, HI  
KWHM-TV 21 – Kahalui Maui, HI  
KWHD-TV 53 – Denver, CO  
WHNO-TV 20 – New Orleans, LA  
WHMB-TV 40 – Indianapolis, IN  
(plus 4 additional stations)

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Annette Garcia, President, Son Broadcasting Network

KCHF-TV 11 – Santa Fe, NM

KYNM-TV 30 – Albuquerque, NM

Marcus Lamb, President & CEO, Daystar Television Network

KKAP-TV 36 – Little Rock, AR

KDTP-TV 39 – Phoenix, AZ

KRMT-TV 41 – Denver, CO

KWBN-TV 44 – Honolulu, HI

WPXS-TV 13 – Mount Vernon, IL

WDTI-TV 69 – Indianapolis, IN

WTSF-TV 61 – Ashland, KY

WYDN-TV 48 – Worcester, MA

KOCM-TV 46 – Norman, OK

KLTJ-TV 22 – Galveston, TX

KDTN-TV 2 – Denton, TX

KWDK-TV 56 – Tacoma, WA

(plus 34 additional stations)

